

Before the
Federal Communications Commission
Washington D.C. 20554

In the Matter Of)
)
Section 63.71 Application of)
)
Windstream NTI, LLC)
Talk America, LLC) WC Docket No. _____
McLeodUSA Telecommunications Services, LLC)
LDMI Telecommunications Services, LLC)
)
For Authority Pursuant to Section 214 of)
the Communications Act of 1934 to)
Discontinue the Provision of Service)
)

SECTION 63.71 APPLICATION OF WINDSTREAM SERVICES, LLC

Windstream Services, LLC (“Windstream”), on behalf of its competitive local exchange carrier affiliates Windstream NTI, LLC, Talk America, LLC, McLeodUSA Telecommunications Services, LLC and LDMI Telecommunications Services, LLC (collectively “Windstream”), through its undersigned counsel and pursuant to Section 214 of the Communications Act of 1934, as amended, 47 U.S.C. §214, and Section 63.71 of the Federal Communications Commission’s (“Commission”) rules, 47 C.F.R. §63.71, hereby files this Application to discontinue the provision of DS0/POTS services, Digital Subscriber Line services, DS1/1.5Mb T-1 Voice, Data and Integrated services (collectively “Affected Services”) in Detroit, Michigan. In support of this Application, Windstream submits the following information:

1. Information listed in 47 C.F.R. § 63.71(a)(1)-(4) (47 C.F.R. § 63.71(b)(2)):

a. Name and Address of Carrier (47 C.F.R. § 63.71(a)(1)-(4), (b)(2)):

Windstream NTI, LLC
Talk America, LLC
McLeodUSA Telecommunications Services, LLC
LDMI Telecommunications Services, LLC

4001 North Rodney Parham Rd.
Little Rock, AR 72212

b. Date of Planned Discontinuance (47 C.F.R. § 63.71(a)(2), (b)(2)):

Windstream plans to discontinue the Affected Services on or about November 30, 2017.

c. Point of Geographic Areas of Service Affected (47 C.F.R. § 63.71(a)(3), (b)(2)):

Affected Services will be discontinued in Detroit, Michigan.

d. Brief Description of the Type of Service to be Affected (47 C.F.R. § 63.71(a)(4), (b)(2)):

The services to be affected are DS0/POTS services, Digital Subscriber Line services, DS1/1.5Mb T-1 Voice, Data and Integrated currently being offered on end of life equipment.

2. Brief Description of the Dates and Methods of Notice to All Affected Customers (47 C.F.R. § 63.71 (b)(3)):

On October 16, 2017, Windstream sent by First Class U.S. Mail notice to all affected customers of the planned discontinuance. A copy of such notice is attached hereto as Attachment 1, which is compliant with, among other things, Section 63.71(a)(5) of the Commission's rules, 47 C.F.R. § 63.71(a)(5).

3. Regulatory Classification of Carrier (47 C.F.R. § 63.71 (a)(4)):

Windstream is nondominant with respect to the services that it proposes to discontinue.

4. Service:

In accordance with Section 63.71(a)(1) of the Commission's rules, 47 C.F.R. § 63.71(a)(1), Windstream is submitting a copy of this Application by First Class U.S. Mail to the Michigan Public Service Commission and the Office of Governor Rick Snyder and also to the Secretary of Defense (at the address given in 47 C.F.R. § 63.71(a)).

5. Additional Questions Regarding This Application May be Addressed to the Undersigned.

6. Circumstances of Discontinuance.

Windstream provides the Affected Services throughout the Detroit metropolitan area. The Affected Services are provided on an end-of-life platform that is scheduled to be decommissioned on or about November 30, 2017. The discontinuance of the Affected Services will affect 396 small business customers and 68 enterprise business customers in Detroit, Michigan. Windstream will assist affected customers in migrating their services to Windstream's supported platform or upgrade to one of our more robust unified communications products.

These customers will not be unduly harmed because they are being provided ample notice of the discontinuance and are being offered alternative services to the ones being discontinued. Furthermore, customers have comparable options at comparable rates from other providers serving Detroit, including but not limited to AT&T, Spectrum and Michigan Access.

7. Conclusion

Windstream believes that the proposed discontinuance is reasonable and necessary. As outlined herein, Windstream will take reasonable steps, to the extent that is able, to assure that the discontinuance of this service is not unduly disruptive to the present or future public convenience and necessity. Accordingly, Windstream respectfully requests that the Commission permit it to discontinue the provision of the Affected Services to customers in Detroit, Michigan pursuant to Section 63.71.

Respectfully Submitted,

A handwritten signature in black ink, reading "Cesar Caballero" with a stylized flourish at the end.

Cesar Caballero
Senior Regulatory Counsel
Windstream Services, LLC
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October 16, 2017

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Section 63.71 Application was served this 16th day of October 2017, by mailing true and correct copies thereof, postage prepaid, to the following persons to the addresses listed below.

Secretary of Defense
Attn: Special Assistance for Telecommunications
Pentagon
Washington, DC 20301

Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Office of Governor Rick Snyder
P.O. Box 30013
Lansing, MI 48909

A handwritten signature in black ink, appearing to read "Cesar Caballero", with a stylized flourish at the end.

Cesar Caballero

Attachment 1

Customer Notice

October 16, 2017



«Customer_Name»
«Addr_Line_2»
«Addr_Line_3»
«Addr_Line_4»
«City_Name», «State_Code» «Zip_Code»

Windstream Services, LLC
4001 N. Rodney Parham Rd.
Little Rock, AR 72212

IMPORTANT: Your Services for Account # Ending in «BENT_CAMS_ID» Will Be Impacted Unless Action is Taken Immediately

Dear «Customer_Name»,

Because your business matters to Windstream, we wanted to provide advance notification of some changes we are making to the location from which your current DS0/POTS services, DS0/DSL services and/or DS1/1.5Mb T-1 Voice, Data and Integrated services are provisioned.

The platform that currently supports these DS0/POTS services, DS0/DSL services and DS1/1.5Mb T-1 Voice, Data and Integrated services has reached the end of its useful life and will soon be decommissioned. As a result, Windstream customers in the Detroit, Michigan area will have these services retired on or about November 30, 2017.

This change will require action on your part in order to avoid service interruption. We apologize for any inconvenience, but would like the opportunity to discuss service options and timing with you to ensure a smooth and seamless transition.

To prevent a permanent service disruption, please contact Windstream as soon as possible to review available options. Failure to do so may result in permanent service termination or insufficient time to transition to a replacement service, with no immediate restoral options.

Windstream offers several next-generation business voice solutions to replace your current service. If you have not already spoken to a Windstream representative and do not have a transition plan in place, we encourage you to take action as soon as possible, but no later than October 31, 2017. If you would like to speak with us immediately, please call 800.347.1991.

The FCC will normally authorize this proposed discontinuance of service (or reduction or impairment) unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the Commission releases public notice of the proposed discontinuance. You may file your comments electronically through the FCC's Electronic Comment Filing System using the docket number established in the Commission's public notice for this proceeding, or you may address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20554, and include in your comments a reference to the § 63.71 Application of Windstream Services, LLC. Comments should include specific information about the impact of this proposed discontinuance (or reduction or impairment) upon you or your company, including any inability to acquire reasonable substitute service.

Again, we apologize for any inconvenience, and look forward to working with you on a solution that will meet your business needs today and into the future. Please visit windstream.com for additional information regarding all of our offerings.

Thank you for your prompt attention to this important matter.

Sincerely,
The Windstream Team